

# Evaluating the Feasibility of Achieving or Approaching Background Policy

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Waste Site Cleanup Advisory Committee  
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# MCP Feasibility Considerations

- Selection of Remedial Alternatives
- Permanent Versus Temporary Solutions
- Reducing OHM below UCLs
- Critical Exposure Pathways
- Achieving or Approaching Background

# Presumptive Certainty

- Meet all requirements of policy
- Alternative approaches acceptable  
Evaluated on a case by case basis

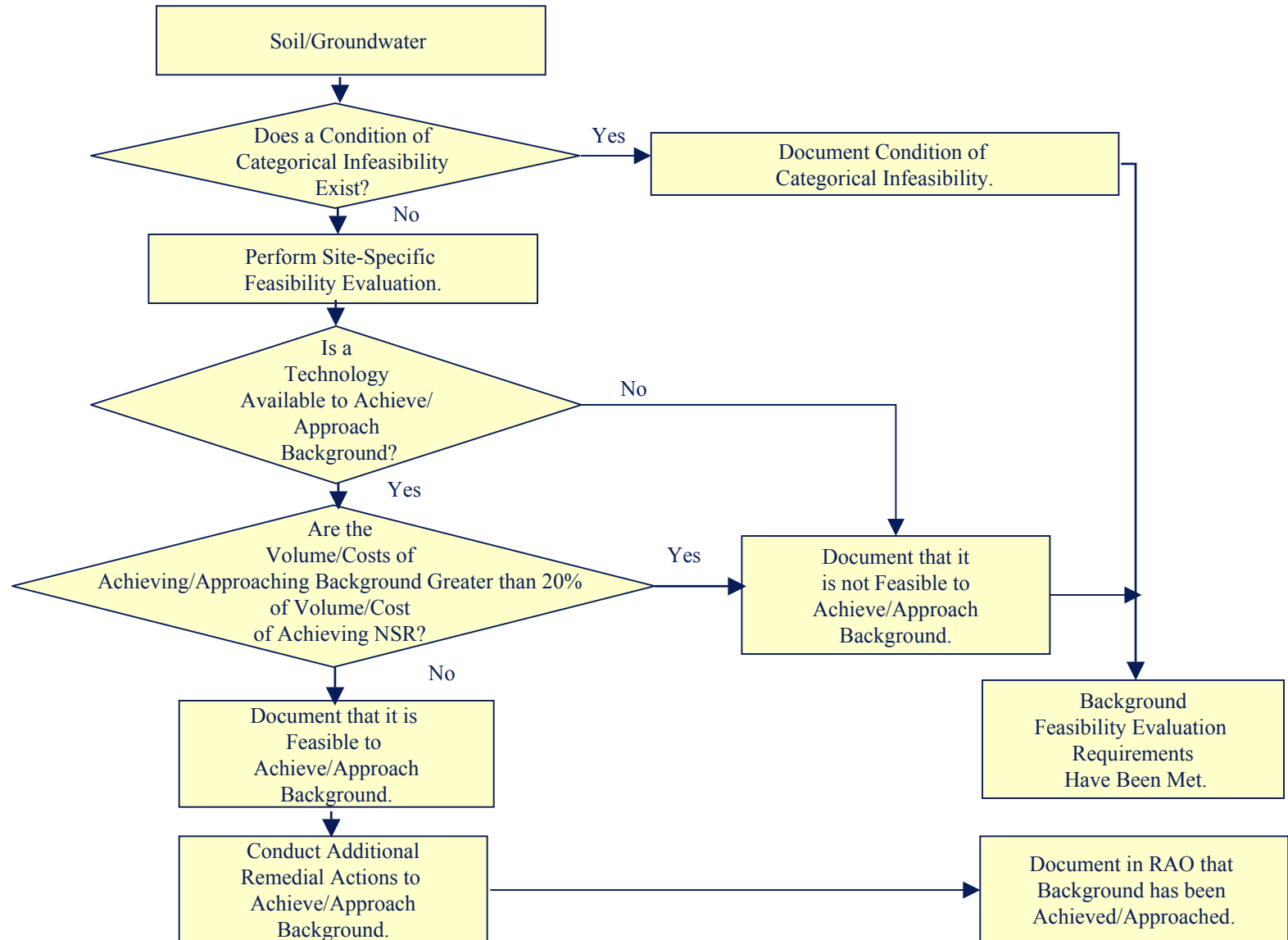
# Purpose of Policy

- Provide standard approaches for evaluation
- Establish timing of evaluation

# Purpose of Policy

- Provide guidance on documenting the feasibility evaluation in a response action submittal
- Identify conditions of Categorical Infeasibility

# Process For Evaluating the Feasibility of Achieving or Approaching Background in Soil and Groundwater as Presented and Supported by this Policy



# Conditions of Categorical Infeasibility

- Nonpersistent Compounds
- Persistent Compounds in S-2 and S-3
- Excavation of OHM under permanent structures
- Remedial actions that will substantially interrupt public service or threaten public safety

# List of Nonpersistent Compounds

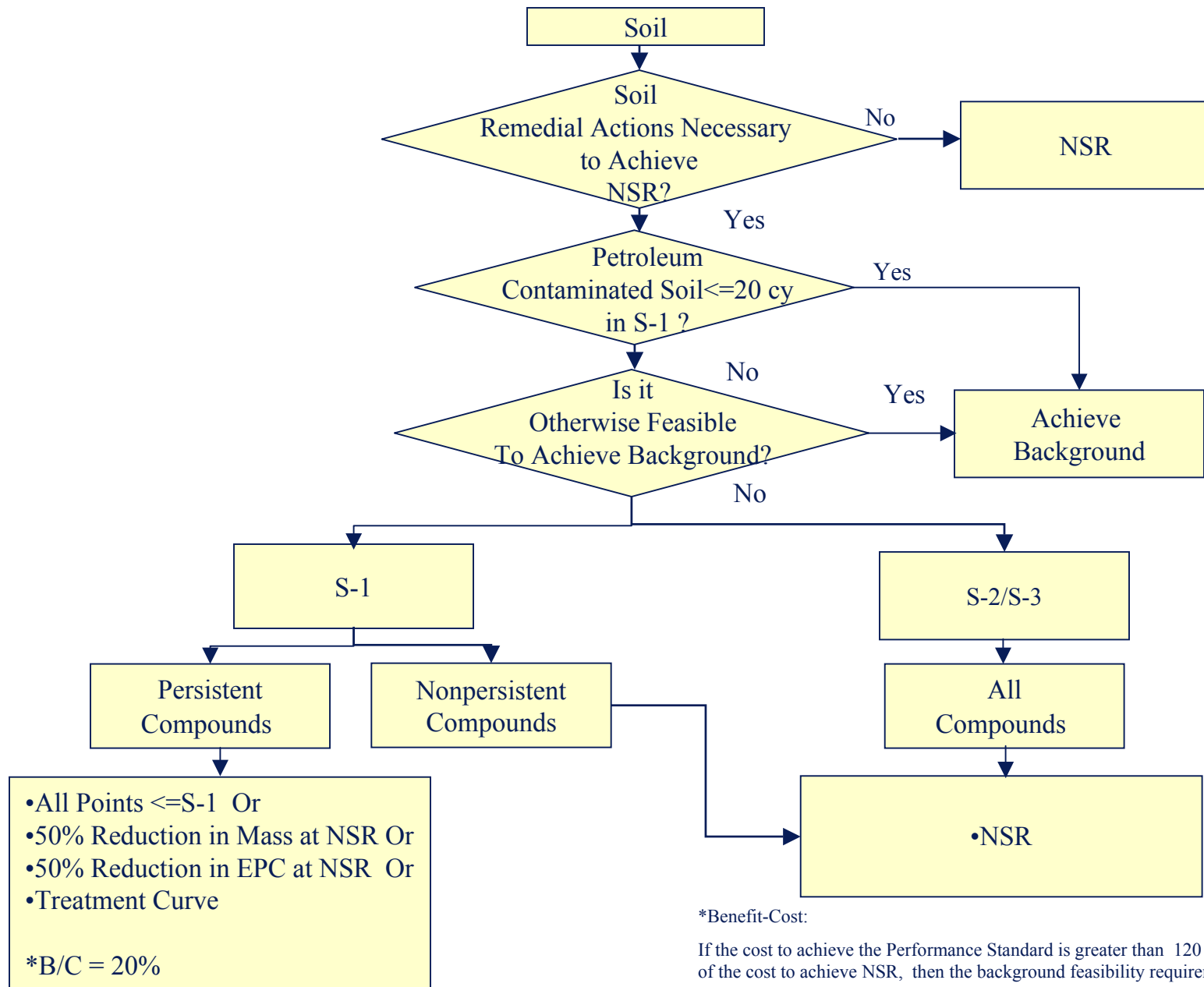
- Petroleum Compounds (except No.6 oil)
- Acenaphthene
- Acetone
- Benzene
- Benzoic Acid
- Chlorobenzene
- Chloroethane
- 2-Chlorophenol
- 2,4-Dichlorophenoxyacetic Acid
- Dimethyl Phthalate
- Ethylbenzene
- Hexachlorobenzene
- 2-Hexanone
- Isophorone
- Methylene Chloride
- Methyl Ethyl Ketone
- Methyl Naphthalene
- Naphthalene
- Nitrobenzene
- Phenol
- Tetrahydrofuran
- Toluene
- 2,4,6-Trichlorophenol
- Xylenes



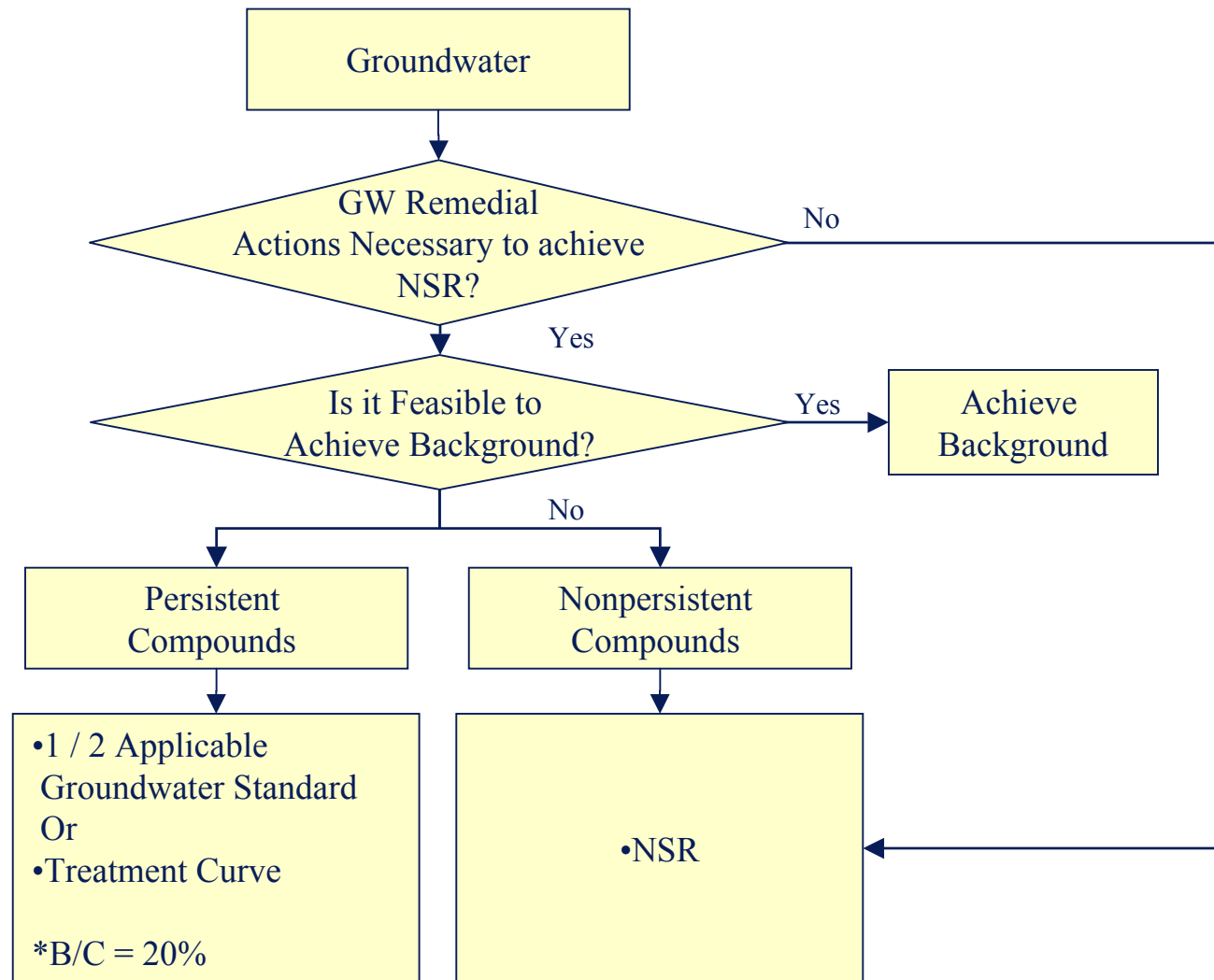
# List of Persistent Compounds

- Arsenic
- Asbestos
- Benzo(a)pyrene
- Benzo(g,h,i)perylene
- Beryllium
- Bromodichloromethane
- Bromoform
- Cadmium
- Carbon Tetrachloride
- Chloroform
- Chromium
- Copper
- Cyanide
- p-Dichlorobenzene(1.4)
- 1,1-Dichloroethane
- 1,2-Dichloroethane
- 1,1-Trichloroethylene
- cis-1,2-Dichloroethylene
- trans-1,2-Dichloroethylene
- 2,6-Dinitrotoluene
- 1,4-Dioxane
- Bis(2-Ethylhexyl)phthalate
- Heptachlor
- Lead
- Mercury
- Methyl Tert-Butyl Ether
- No. 6. Fuel Oil
- Pentachlorophenol
- PCBs
- Selenium
- 1,1,2,2-Tetrachloroethane
- Tetrachloroethylene
- 1,2,4-Trichlorobenzene
- 1,1,1-Trichloroethane
- 1,1,2-Trichloroethane
- Trichloroethylene
- Vinyl Chloride
- Zinc

# Soil Criteria for Achieving and Approaching Background



# Groundwater Criteria for Achieving and Approaching Background



\*Benefit-Cost:

If the cost to achieve the Performance Standard is greater than 120 percent of the cost to achieve NSR, then the background feasibility requirements of M.G.L. c.21E and MCP have been met and no further action is necessary.

# For More Information

- Draft Policy on-line:

<http://www.mass.gov/dep>

- Contact: Rose Knox

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